

Exhibit E

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8 *through Cal. Highway Patrol, Blackwood, Kee, and*
Rubalcava

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10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA
12 EASTERN DIVISION
13

14 **L.C., a minor by and through her**
guardian ad litem Maria Cadena, et
15 **al.,**
16 Plaintiffs,
17
18 v.
19 **STATE OF CALIFORNIA, et al.,**
20 Defendants.
21

No. 5:22-cv-00949 KK (SHKx)

**SUPPLEMENTAL AND
REBUTTAL DISCLOSURE OF
EXPERT WITNESSES OF
DEFENDANTS STATE OF
CALIFORNIA, BLACKWOOD,
KEE, AND RUBALCAVA [FRCP
26(a)(2)]**

Judge: Hon. Kenly Kiya Kato
Trial Date: June 2, 2025
Action Filed: June 7, 2022

22
23 Under Federal Rule of Civil Procedure 26(a)(2)(D)(ii) and (E), Defendants
24 State of California, by and through the California Highway Patrol (CHP), Michael
25 Blackwood, Isaiah Kee, and Bernardo Rubalcava (collectively State Defendants)
26 produce the attached report of the supplemental opinions of their previously
27 disclosed expert Greg Meyer, as well as Mr. Meyer's rebuttal opinions to the
28 opinions offered by Plaintiffs' expert Roger Clark.

1 State Defendants reserve the right to call as a witness any and all experts
2 designated by any other party.

3 State Defendants reserve the right to call as their own expert witnesses any
4 additional expert witness needed for rebuttal or impeachment at the time of trial.

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6 Dated: February 13, 2025

Respectfully submitted,

7 ROB BONTA
8 Attorney General of California
9 NORMAN D. MORRISON
Supervising Deputy Attorney General

10 */s/ Diana Esquivel*

11 DIANA ESQUIVEL
12 Deputy Attorney General
13 *Attorneys for Defendants Blackwood,*
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L.C., a minor, *et al.*

v.

STATE OF CALIFORNIA, *et al.*


**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Case No. 5:22-cv-00949-JGB-KK

**EXPERT REBUTTAL REPORT
BY
GREG MEYER
February 12, 2025**

After reviewing Plaintiff's expert disclosures on February 10, 2025 (for Plaintiff's expert Roger Clark) and on February 11, 2025 (for Plaintiff's expert Matthew Kimmins), I testified in rebuttal to both of them during my deposition on February 12, 2025. My rebuttal opinions are contained within in the transcript of my deposition.

Executed on February 12, 2025 at Glendale, California.



GREG MEYER

DECLARATION OF SERVICE BY ELECTRONIC MAIL

Name: *L.C., et al. v. State of California, et al.*
No.: 5:22-cv-00949 KK (SHKx)

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

On **February 13, 2025**, I served the attached

SUPPLEMENTAL AND REBUTTAL DISCLOSURE OF EXPERT WITNESSES OF DEFENDANTS STATE OF CALIFORNIA, BLACKWOOD, KEE, AND RUBALCAVA [FRCP 26(a)(2)]

by transmitting a true copy thereof in PDF format by electronic mail to the following:

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I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct, and that this declaration was executed on February 13, 2025, at Sacramento, California.

Diana Esquivel
Declarant

/s/ Diana Esquivel
Signature